

# **Exhibit C**

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7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
8 IN AND FOR THE COUNTY OF KING  
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10 FIRST FED BANK, a Washington state bank  
11 corporation,

12 Petitioner,

13 v.

14 IDEAL PROPERTY INVESTMENTS, LLC, a  
15 Washington limited liability company,

Respondent.

Case No. 24-2-08418-5 SEA

STIPULATION AND ORDER TO  
AMEND APPOINTING ORDER

16 I. STIPULATION

17 On May 3, 2024, this Court entered an order, at Docket No. 51, appointing TurningPointe  
18 LLC d/b/a Turning Point Strategic Advisors (“**Receiver**”), as a general receiver over Ideal Property  
19 Investments LLC (“**Debtor**”) in this proceeding (“**Appointing Order**”).

20 The undersigned parties, by and through their respective counsel of record, hereby stipulate  
21 and agree to amend the Appointing Order as follows:

22 1. Exhibit A, attached hereto, should be attached to the Appointing Order as  
23 “Schedule 1” to the Appointing Order;

24 2. Receiver is qualified under RCW 7.60.035 to serve as a receiver over the entities and  
25 properties identified in the attached Exhibit A;

26 3. Receiver should be appointed as a general receiver over the entities and properties

STIPULATION AND ORDER TO AMEND APPOINTING ORDER- 1

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identified in the attached Exhibit A;

4. For administrative efficiency, the receivership estates of each entity or property identified in the attached Exhibit A should be jointly administered as separate estates under the same case caption and number as the Debtor's receivership case, with the Debtor's receivership case being the "lead" case and each other entity's or property's respective receivership case being a "related" case; and

5. The Appointing Order should be amended as set forth in the subjoined Order.

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Attorneys for Respondent

Attorney for Ryan Wear

## II. ORDER

THIS MATTER came before the Court on the foregoing stipulation of the parties.

Having considered the foregoing Stipulation, the Court hereby ORDERS that the Appointing Order, Dkt. # 51, is hereby amended as follows:

1. The document attached to this Order as Exhibit A shall be attached to the Appointing Order as the “Schedule 1” referenced therein;

2. The definition of “Respondent” in the Appointing Order is hereby amended to include all entities identified as a Title Owner in the attached Exhibit A;

3. The definition of “Estate Property” in the Appointing Order is hereby amended to include, respectively for each Respondent’s receivership estate, all assets owned by the Respondent, including without limitation all properties attributed to a Respondent as a Title Owner in the attached Exhibit A or otherwise identified therein;

4. For administrative efficiency, the receivership estates of each Respondent shall be jointly administered as separate estates under the same case caption and number as the Debtor’s receivership case, with the Debtor’s receivership case being identified as the “lead” case and each other Respondent’s respective receivership case being identified as a “related” case;

5. A creditor submitting a proof of claim against one or more Respondents shall identify in its proof of claim which Respondent(s) the claim is asserted against; and

6. All other terms in the Appointing Order remain in full force and effect.

DATED this \_\_\_\_ day of June, 2024.

JUDGE/COMMISSIONER

Presented by:

SNELL & WILMER L.L.P.

By: /s/ Amit D. Ranade

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Attorneys for Receiver

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# EXHIBIT A

## **SCHEDULE 1**

<b>Property Address</b>	<b>Title Owner</b>
653 E. 20 <sup>th</sup> Street, Yuma, AZ 85365	Ideal Property Investments LLC
700 S. Arizona Blvd., Coolidge, AZ 85128	Ideal Property Investments LLC
1930 N. 22 <sup>nd</sup> Ave., Phoenix, AZ 85009	Ideal Property Investments LLC
4237 E. Magnolia, Phoenix, AZ 85034	Ideal Property Investments LLC
530 Opper Street, Escondido, CA 92029	Ideal Property Investments LLC
25377 Huntwood Ave., Hayward, CA 94544	Ideal Property Investments LLC
877 Orange Ave., Tallahassee, FL 32310	Ideal Property Investments LLC
2129 Andrea Lane, Fort Myers, FL 33912	2129 Andrea Lane LLC
1118 Virginia Ave., Columbus, GA 31901	1118 Virginia Street LLC
1924 North Ave. W, Missoula, MT 59801	Ideal Property Investments LLC
701 Eden Terrace, Archdale, NC 27263	701 Eden LLC
7925 Arby Ave., Las Vegas, NV 89113	Ideal Property Investments LLC
19355 SW Teton Ave., Tualatin, OR 97062	Ideal Property Investments LLC
2709 Electronic Lane, Dallas, TX 75220	Ideal Property Investments LLC
11519 S. Petropark Ave., Houston, TX 77041	11519 South Petropark LLC
343 Johnny Clark Rd., Longview, TX 75605	343 Johnny Clark LLC
586 W. 9320 South, Sandy, UT	Ideal Property Investments LLC
12 Emery Road, Oroville, WA 98844	Ideal Property Investments LLC
11410 Beverly Park Rd., Everett, WA 98204	Ideal Property Investments LLC
3200 Shoreline Dr., Camano Island, WA 98282	Ideal Property Investments LLC
3811 188 <sup>th</sup> St. NE, Arlington, WA 98223 14925	Ideal Property Investments LLC
14925 35th Ave. NE, Marysville, WA 98271	Ideal Industrial Park LLC
27423 40 <sup>th</sup> Ave., Stanwood, WA 98292	Ideal Industrial Park LLC
27602 40 <sup>th</sup> Ave., Stanwood, WA 98292	Ideal Industrial Park LLC

King County Superior Court  
Judicial Electronic Signature Page

Case Number: 24-2-08418-5  
Case Title: FIRST FED BANK VS IDEAL PROPERTY INVESTMENTS  
Document Title: Order  
  
Signed By: Michael R. Scott  
Date: June 13, 2024



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Judge: Michael R. Scott

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 099C583EFDD05FB18A3076329526934213FAC4A0  
Certificate effective date: 3/30/2023 1:30:41 PM  
Certificate expiry date: 3/30/2028 1:30:41 PM  
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="Michael Scott:  
Po6Ro6kz7RG4KIcIp8tZaw=="